

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Sean Thomas Orabona  
Debtor

Chapter 13  
Bankruptcy No. 21-12880-pmm

PennyMac Loan Services, LLC., or its Successor  
or Assignee

Movant

vs.

SCOTT F. WATERMAN (Chapter 13), Trustee  
Sean Thomas Orabona  
Respondents

**SETTLEMENT STIPULATION**

WHEREAS, on October 22, 2021, Sean Thomas Orabona (the "Debtor") filed a Petition under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Pennsylvania;

WHEREAS, on April 1, 2022, PennyMac Loan Services, LLC. (Movant) filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. Section 362(a) (the "Motion") regarding property located at: 224 Koenig Road, Bernville, Pennsylvania 19506;

WHEREAS, Movant and the Debtor are desirous of settling the dispute among and between themselves;

NOW THEREFORE, each in consideration of the promises of the other and intending to be legally bound, subject to the approval of the Bankruptcy Court, it is hereby agreed by and among counsel for Movant, by and through its attorneys, MARGARET GAIRO, ESQUIRE, MARISA M. COHEN, ESQUIRE, and ANDREW M. LUBIN, ESQUIRE, and the Debtor, by and through his/her counsel, Peter J Mulcahy, Esquire ("Debtor's Counsel") as follows:

1. The parties hereby certify that the post-petition delinquency is \$9,269.60, consisting of post-petition payments and late charges for the months of December 1, 2021 through April 1, 2022. Debtor's monthly mortgage payment is \$1,853.92. Movant has incurred attorney fees and costs totaling \$1,038.00 thereby increasing the arrears to \$10,307.60.

2. Debtor shall pay the post-petition arrears in the amount of \$10,307.60 by making four (4) payments of \$1,717.93 each for a total of \$6,871.72 beginning on May 15, 2022 through August 15, 2022 and two (2) payments of \$1,717.94 each for a total of \$3,435.88 beginning on September 15, 2022 through October 15, 2022.

3. Debtor shall resume making regular monthly mortgage payments in the amount of \$1,853.92 beginning on May 1, 2022

4. All payments are to be made payable to PennyMac Loan Services, LLC. at the following address: PennyMac Loan Services, LLC, PO Box 660929, Dallas, Texas 75266-0929.

5. The last four digits of your loan number 3554. Please remember to write your entire account number on the lower left-hand corner of your payment to ensure proper processing.

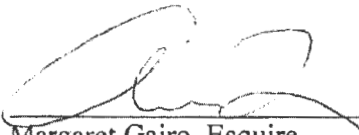
6. Should Debtor fail to comply with any of the terms of this Stipulation, including but not limited to, failure to make the above described payments, or any regular monthly mortgage payment commencing after the cure of the post-petition delinquency, then Movant may send Debtor and counsel a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for Movant may file a Certification of Default with the Court. Said Certification of Default may include a certification of Debtor's failure to pay subsequent payments that fall due after the date of the notice of default. Upon Certification, the Court shall enter an Order granting relief from the automatic stay as to the mortgaged property.

7. In the event the Debtor converts his/her case to Chapter 11, the terms of this Stipulation shall remain in full force and effect. In the event that Debtor converts his/her case to a Chapter 7, Debtor shall cure all pre-petition and post-petition arrears within ten (10) days of the date of conversion. Failure to cure the arrears shall constitute an event of default under this Stipulation and Movant may send Notice of Default and certify default as set forth in the

preceding paragraph.

8. Attorney fees and costs for issuing Notice to Cure, Notice / Certificate / Affidavit of Default, and order for relief are recoverable and may be added to the arrearage.

9. Counsel for Debtor has authority to settle this matter on behalf of his/her clients.

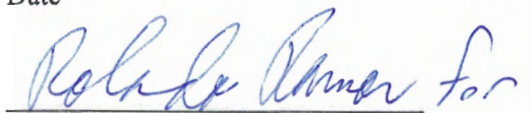


Margaret Gairo, Esquire  
Marisa M. Cohen, Esquire  
Andrew M. Lubin, Esquire  
McCabe, Weisberg & Conway, LLC  
123 S. Broad Street, Suite 1400  
Philadelphia, PA 19109  
Attorney for Movant

4/22/22  
Date

/s/ Peter J. Mulcahy  
Peter J Mulcahy  
Recovery Law Group  
12 Penns Trail, Ste 2nd Floor  
Newtown, Pennsylvania 18904  
Attorney for Debtor

04/22/2022  
Date



Scott F. Waterman  
2901 St. Lawrence Ave., Suite 100  
Reading, PA 19606  
Trustee

5/17/22  
Date

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**ORDER GRANTING SETTLEMENT STIPULATION**

It is hereby ORDERED that the Stipulation to Settle Motion of PennyMac Loan Services, LLC. for Relief from the Automatic Stay is hereby APPROVED.



**Date: May 18, 2022**

Hon. Patricia M. Mayer

U.S. Bankruptcy Judge